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9 | Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,  
Plaintiff,

vs.

14 UBER TECHNOLOGIES, INC.;  
15 OTTOMOTTO LLC; OTTO TRUCKING  
16 LLC,  
Defendants

CASE NO. 3:17-cv-00939

## WAYMO LLC'S RESPONSE TO REQUEST FOR LITERATURE

18 Pursuant to the Court’s Request for Literature (Dkt. No. 73), Plaintiff Waymo LLC  
19 (“Waymo”) submits the following publication, attached hereto as Exhibit A: *Performance*  
20 *Analysis of Next-Generation LADAR for Manufacturing, Construction, and Mobility*, National  
21 Institute of Standard & Technology (2004) (the “NIST Publication”) (available at  
22 <http://fire.nist.gov/bfrlpubs/build04/PDF/b04032.pdf>). The NIST Publication discusses  
23 fundamental concepts underlying the technology at issue in this case, including time-of-flight  
24 measurements, LiDAR accuracy and resolution, 3D scanning, and single-laser versus laser-array  
25 systems. The NIST publication also addresses the adaptation of LiDAR to self-driving vehicles.  
26 Waymo respectfully submits that, after consulting with its employees and experts, it was unable to  
27 identify a single publication in the prior art or public domain that also specifically addresses  
28 strategies for positioning multiple laser diodes behind a lens for the best overall detection in

1 autonomous vehicles or the use of a single lens to project outgoing light beams and focus  
2 incoming reflections, apart from the patents-in-suit or other Waymo documentation. However, the  
3 NIST Publication includes a discussion of different optical systems that are used for LiDAR  
4 applications, which will provide a helpful backdrop for understanding the optical systems  
5 specifically at issue in this case.

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